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December 23, 2024

**Via CM/ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York

**MEMO ENDORSED**

**Re: Wahab vs. Best Vacuum and Appliances, LLC**  
**Case #: 1:24-cv-04207-KPF**

Dear Judge Failla:

This firm represents the Plaintiff in the above-referenced matter. We write in response to the Court's request for joint letter and proposed case management plan on this matter. Plaintiff has been unable to complete service of the Summons and Complaint on the Defendant although numerous attempts have been made. Plaintiff requests that the Court extend the time to complete service thirty (30) days from today's date so that the Plaintiff can continue its efforts to serve the Summons and Complaint as a new possible address for the defendant has been located. In addition, Plaintiff also requests that the Initial Pretrial Conference currently scheduled for December 27, 2024 also be adjourned thirty (30) days. This is Plaintiff's third request to adjourn both dates.

We thank Your Honor and the Court for its kind consideration and courtesies.

Respectfully submitted,

s/ Rami Salim  
Rami Salim, Esq.

Application GRANTED in part and DENIED in part.

The initial pretrial conference currently scheduled for December 27, 2024, is hereby ADJOURNED *sine die*.

The Court DENIES Plaintiff's late request for additional time to complete service without prejudice to its renewal in a letter, to be filed on or before **January 10, 2025**, explaining in detail Plaintiff's efforts to date to serve the summons and complaint, and why additional time is necessary.

The Clerk of Court is directed to terminate the pending motion at docket entry 10.

Dated: December 23, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE